

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

TPC GROUP INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 22-10493 (CTG)

Jointly Administered

**AMENDED² NOTICE OF AGENDA FOR OMNIBUS HEARING
SCHEDULED FOR JULY 15, 2022, AT 10:00 A.M. (E.T.)**

This remote hearing will be conducted entirely over Zoom and requires all participants to register in advance. This hearing will serve as a Status Conference on the Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Senior Secured Priming Superpriority Postpetition Financing and (B) Use Cash Collateral, (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (III) Granting Adequate Protection to Prepetition Secured Parties; (IV) Modifying the Automatic Stay; and (V) Granting Related Relief. Please register by July 14, 2022 at 4:00 p.m. Eastern Time.

COURTCALL WILL NOT BE USED FOR THIS HEARING.

Please use the following link to register for this hearing:

<https://debuscourts.zoomgov.com/meeting/register/vJlscOitpjIoH7X2vf3Ipv35XF3XhXdkSf8>

After registering your appearance by Zoom, you will receive a confirmation email containing information about joining the hearing.

**YOU MUST USE YOUR FULL NAME WHEN LOGGING INTO ZOOM OR
YOU WILL NOT BE ALLOWED INTO THE MEETING.**

Topic: TPC Group, Inc.

Time: July 15, 2022 at 10:00 AM Eastern Time (US and Canada)

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: TPC Group Inc. (3618); TPC Holdings, Inc. (7380); TPC Group LLC (8313); Texas Butylene Chemical Corporation (7440); Texas Olefins Domestic International Sales Corporation (4241); TPC Phoenix Fuels LLC (9133); Port Neches Fuels, LLC (1641); and TP Capital Corp. (6248). Each Debtor's corporate headquarters and mailing address is 500 Dallas St., Suite 2000, Houston, Texas 77002.

² Amended items appear in **bold**.

I. CONTINUED MATTERS:

1. Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to (A) Continue Their Existing Cash Management System, (B) Maintain Existing Business Forms, (C) Continue Intercompany Arrangements, (D) Continue Using P-Cards; and (E) Pay Bank Fees (II) Granting an Extension of Time to Comply With 11 U.S.C. § 345(B); and (III) Granting Related Relief [[Docket No. 9](#) – filed June 1, 2022].

Objection Deadline: June 22, 2022, at 4:00 p.m. (ET).

Objections/Responses Received:

- i. Informal comments from the Official Committee of Unsecured Creditors.

Related Documents:

- i. Interim Order (I) Authorizing Debtors to (A) Continue Their Existing Cash Management System, (B) Maintain Existing Business Forms, (C) Continue Intercompany Arrangements, (D) Continue Using P-Cards; and (E) Pay Bank Fees (II) Granting an Extension of Time to Comply With 11 U.S.C. § 345(b); and (III) Granting Related Relief [[Docket No. 122](#) – entered June 2, 2022]; and
- ii. Supplement to Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to (A) Continue Their Existing Cash Management System, (B) Maintain Existing Business Forms, (C) Continue Intercompany Arrangements, (D) Continue Using P-Cards; and (E) Pay Bank Fees (II) Granting an Extension of Time to Comply With 11 U.S.C. § 345(B); and (III) Granting Related Relief [[Docket No. 222](#) – filed June 16, 2022].

Status: **This matter will be continued to the next hearing.**

II. RESOLVED MATTERS:

2. Motion to File Under Seal Debtors' Motion for Entry of an Order (I) Approving the Debtors' Assumption of Commercial Contracts, as Amended, and (II) Granting Related Relief [[Docket No. 55](#) – filed June 1, 2022].

Objection Deadline: June 15, 2022, at 4:00 p.m. (ET).

Objections/Responses Received:

- i. Informal comments received from the U.S. Trustee.

Related Documents:

- i. Notice of Proposed Redacted Version of Debtors' Motion for Entry of an Order (I) Approving the Debtors' Assumption of Commercial Contracts, as Amended, and (II) Granting Related Relief [[Docket No. 54](#) – filed June 1, 2022];
- ii. Notice of Filing of Revised Proposed Redacted Version of Debtors' Motion for Entry of an Order (I) Approving the Debtors' Assumption of Commercial Contracts, as Amended, and (II) Granting Related Relief [[Docket No. 366](#) – filed July 1, 2022]; and
- iii. Order Granting Debtors' Motion to File Under Seal Debtors' Motion for Entry of an Order (I) Approving the Debtors' Assumption of Commercial Contracts, as Amended, and (II) Granting Related Relief [[Docket No. 411](#) – entered July 12, 2022].

Status: On July 12, 2022, the Court entered an order with respect to this matter. Accordingly, a hearing on this matter is no longer necessary.

3. Debtors Motion for Entry of an Order (I) Approving the Debtors Assumption of Commercial Supply Contracts with CPChem, as Amended, and (II) Granting Related Relief [[Docket No. 294](#) – filed June 23, 2022].

Objection Deadline: July 7, 2022, at 4:00 p.m. (ET).

Objections/Responses Received:

- i. Informal comments received from the U.S. Trustee.

Related Documents:

- i. Omnibus Supplemental Declaration of Robert A. Del Genio in Support of the Debtors Assumption Motions [[Docket No. 398](#) – filed July 8, 2022]; and
- ii. **Order (I) Approving the Debtors' Assumption of Commercial Supply Contracts with CPChem, as Amended, and (II) Granting Related Relief** [[Docket No. 440](#) – entered July 14, 2022].

Status: On July 14, 2022, the Court entered an order with respect to this matter. Accordingly, a hearing on this matter is no longer necessary.

4. Debtors Motion for Entry of an Order (I) Approving the Debtors Assumption of a Sales Contract with Trafigura Trading, LLC and (II) Granting Related Relief [[Docket No. 308](#) – filed June 27, 2022].

Objection Deadline: July 8, 2022, at 4:00 p.m. (ET)

Objections/Responses Received: None.

Related Documents:

- i. Omnibus Supplemental Declaration of Robert A. Del Genio in Support of the Debtors Assumption Motions [[Docket No. 398](#) – filed July 8, 2022]; and
- ii. Order (I) Approving the Debtors' Motion for Entry of an Order (I) Approving the Debtors' Assumption of a Sales Contract with Trafigura Trading, LLC and (II) Granting Related Relief [[Docket No. 412](#) – entered July 12, 2022].

Status: On July 12, 2022, the Court entered an order with respect to this matter. Accordingly, a hearing on this matter is no longer necessary.

5. Debtors' Motion for Entry of an Order (I) Approving the Debtors' Assumption of a Commercial Supply Contract with Sasol, as Amended, and (II) Granting Related Relief [[Docket No. 368](#) – filed July 1, 2022].

Objection Deadline: July 8, 2022 at 4:00 p.m. (ET).

Objections/Responses Received:

- i. Informal comments received from the U.S. Trustee.

Related Documents:

- i. Omnibus Supplemental Declaration of Robert A. Del Genio in Support of the Debtors Assumption Motions [[Docket No. 398](#) – filed July 8, 2022]; and
- ii. Omnibus Certification of Counsel Regarding Proposed Orders Approving the Debtors' Assumption of Certain Commercial Supply Contracts [[Docket No. 422](#) - filed July 12, 2022].

Status: A certification of counsel has been filed. No hearing is necessary unless the Court has questions concerning the Motion.

6. Debtors' Motion for Entry of an Order (I) Approving the Debtors' Assumption of Commercial Contracts with Nova, as Amended, and (II) Granting Related Relief [[Docket No. 369](#) – filed July 1, 2022].

Objection Deadline: July 8, 2022 at 4:00 p.m. (ET).

Objections/Responses Received:

- i. Informal comments received from the U.S. Trustee.

Related Documents:

- i. Omnibus Supplemental Declaration of Robert A. Del Genio in Support of the Debtors Assumption Motions [[Docket No. 398](#) – filed July 8, 2022]; and
- ii. Omnibus Certification of Counsel Regarding Proposed Orders Approving the Debtors’ Assumption of Certain Commercial Supply Contracts [[Docket No. 422](#) - filed July 12, 2022].

Status: A certification of counsel has been filed. No hearing is necessary unless the Court has questions concerning the Motion.

III. MATTERS GOING FORWARD:

7. Motion of Debtors Pursuant to 11 U.S.C. §§ 105(A) and 366 and Fed. Bankr. P. 6003 and 6004 for Entry of Interim and Final Orders (I) Approving Debtors’ Proposed Form of Adequate Assurance of Payment to Utility Companies, (II) Establishing Procedures for Resolving Objections by Utility Companies, (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service, and (IV) Granting Related Relief [[Docket No. 11](#) – filed June 1, 2022].

Objection Deadline: June 22, 2022, at 4:00 p.m. (ET); extended to June 27, 2022, at 12:00 p.m. (ET) for the Official Committee of Unsecured Creditors (the “UCC”) and the Office of the United States Trustee (the “U.S. Trustee”).

Objections/Responses Received:

- i. Objection of Cokinos Energy Corporation to Entry of a Final Order on Debtors’ Motion Pursuant to 11 U.S.C. §§ 105(A) and 366 and Fed. Bankr. P. 6003 and 6004 for Entry of Interim and Final Orders (I) Approving Debtors’ Proposed Form of Adequate Assurance of Payment to Utility Companies, (II) Establishing Procedures for Resolving Objections by Utility Companies, (III) Prohibiting Utility Companies From Altering, Refusing, or Discontinuing Service, and (IV) Granting Related Relief [[Docket No. 274](#) – filed June 22, 2022];
- ii. Objection of Symmetry Energy Solutions, LLC to the Motion of Debtors Pursuant to 11 U.S.C. §§ 105(A) and 366 and Fed. Bankr. P. 6003 and 6004 for Entry of Interim and Final Orders (I) Approving Debtors’ Proposed Form of Adequate Assurance of Payment to Utility Companies, (II) Establishing Procedures for Resolving Objections by Utility Companies, (III) Prohibiting Utility Companies From Altering, Refusing, or Discontinuing Service, and (IV) Granting Related Relief [[Docket No. 276](#) – filed June 22, 2022];
- iii. Objection by Clean Harbors Industrials Services to Motion of Debtors Pursuant to 11 U.S.C. §§ 105(A) and 366 and Fed. Bankr. P. 6003 and 6004 for Entry of Interim and Final Orders (I) Approving Debtors’ Proposed Form of Adequate Assurance of

Payment to Utility Companies, (II) Establishing Procedures for Resolving Objections by Utility Companies, (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service, and (IV) Granting Related Relief [[Docket No. 281](#) – filed June 22, 2022];

- iv. Cokinos Energy Corporation's Witness and Exhibit List for Hearing on Debtors' Motion Pursuant to 11 U.S.C. §§105(a) and 366 and Fed. R. Bankr. P. 6003 and 6004 for Entry of Final Order (I) Approving Debtors' Proposed Form of Adequate Assurance of Payment to Utility Companies, (II) Establishing Procedures for Resolving Objection by Utility Companies, (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service, and (IV) Granting Related Relief [[Docket No. 299](#) – filed June 27, 2022]; and
- v. [WITHDRAWN] Kinder Morgan Texas Pipeline Company, LLC's Objection to Debtors' Designation of Kinder Morgan Texas Pipeline Company, LLC as a Utility [[Docket No. 282](#) – filed June 23, 2022].

Related Documents:

- i. Interim Order (I) Approving Debtors' Proposed Form of Adequate Assurance of Payment to Utility Companies, (II) Establishing Procedures for Resolving Objections by Utility Companies, (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service, and (IV) Granting Related Relief [[Docket No. 119](#) – entered June 2, 2022];
- ii. Notice of Withdrawal of Kinder Morgan Texas Pipeline Company, LLC's Objection to Debtors' Designation of Kinder Morgan Texas Pipeline Company, LLC as a Utility [[Docket No. 296](#) – filed June 24, 2022];
- iii. Notice of Withdrawal of Objection of Cokinos Energy Corporation to Entry of a Final Order on Debtors' Motion Pursuant to 11 U.S.C. §§ 105(A) and 366 and Fed. Bankr. P. 6003 and 6004 for Entry of Interim and Final Orders (I) Approving Debtors' Proposed Form of Adequate Assurance of Payment to Utility Companies, (II) Establishing Procedures for Resolving Objections by Utility Companies, (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service, and (IV) Granting Related Relief [[Docket No. 314](#) – filed June 28, 2022]; and
- iv. Notice of Withdrawal of Objection of Symmetry Energy Solution, LLC to the Motion of Debtors Pursuant to 11 U.S.C. §§105(a) and 366 and Fed. Bankr. P. 6003 and 6004 for Entry of Interim and Final Orders (I) Approving Debtors' Proposed Form of Adequate Assurance of Payment to Utility Companies, (II) Establishing Procedures for Resolving Objections by Utility Companies, (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service, and (IV) Granting Related Relief [[Docket No. 327](#) – filed June 29, 2022].

Status: The Debtors have resolved the objections of Cokinos Energy Corporation and Kinder Morgan Texas Pipeline Company, LLC, and Symmetry Energy Solutions, LLC.

This matter is continued to the next hearing with respect to the objection filed by Clean Harbors Industrials Services.

8. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Senior Secured Priming Superpriority Postpetition Financing and (B) Use Cash Collateral, (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (III) Granting Adequate Protection to Prepetition Secured Parties; (IV) Modifying the Automatic Stay; and (V) Granting Related Relief [[Docket No. 36](#) – filed June 1, 2022].

Objection Deadline: June 22, 2022 at 4:00 p.m. (ET); extended by agreement among the parties to July 8, 2022 at 4:00 p.m. (ET) for the U.S. Trustee, UCC, Ad Hoc Group of Non-Consenting Noteholders, and Mockingbird Credit Opportunities Company.

Objections/Responses Received:

- i. Limited Objection and Reservation of Rights of Mockingbird Credit Opportunities Company to the Debtors' DIP Motion [[Docket No. 69](#) – filed June 1, 2022];
- ii. Objection of Ad Hoc Group of Non-Consenting Noteholders to Debtors' Motion for Entry of Interim and Final Orders Approving DIP Financing [[Docket No. 76](#) – filed June 2, 2022];
- iii. Objection of the Taxing Authorities to Debtors Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Senior Secured Priming Superpriority Postpetition Financing and (B) Use Cash Collateral, (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (III) Granting Adequate Protection to the Prepetition Secured Parties, (IV) Modifying the Automatic Stay, and (V) Granting Related Relief [[Docket No. 280](#) – filed June 22, 2022];
- iv. [SEALED] Official Committee of Unsecured Creditors' Objection to Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Senior Secured Priming Superpriority Postpetition Financing and (B) Use Cash Collateral, (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (III) Granting Adequate Protection to the Prepetition Secured Parties, (IV) Modifying the Automatic Stay and (V) Granting Related Relief [[Docket No. 390](#) – filed July 8, 2022];
- v. Joinder to Objection of Official Committee of Unsecured Creditors to the Debtors Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Senior Secured, Priming Superpriority Postpetition Financing and (B) Use Cash Collateral, (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (III) Granting Adequate Protection to the Prepetition Secured Parties, (IV) Modifying the Automatic Stay and (V) Granted Related Relief [[Docket No. 391](#) – filed July 8, 2022];

- vi. Objection and Reservation of Rights of Mockingbird Credit Opportunities Company to Final Approval of the Debtors DIP Motion [[Docket No. 392](#) – filed July 8, 2022]; and
- vii. [SEALED] Supplemental Objection of Cerberus Capital Management, L.P. and Bayside Capital, Inc. to Debtors Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Senior Secured Priming Superpriority Postpetition Financing and (B) Use Cash Collateral, (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (III) Granting Adequate Protection to the Prepetition Secured Parties, (IV) Modifying the Automatic Stay, and (V) Granting Related Relief [Docket No. 393 – filed July 8, 2022].

Related Documents:

- i. [SEALED] Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Senior Secured Priming Superpriority Postpetition Financing and (B) Use Cash Collateral, (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (III) Granting Adequate Protection to Prepetition Secured Parties; (IV) Modifying the Automatic Stay; and (V) Granting Related Relief [Docket No. 56 – filed June 1, 2022];
- ii. [SEALED] Declaration of Zul Jamal in Support of Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Senior Secured Priming Superpriority Postpetition Financing and (B) Use Cash Collateral, (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (III) Granting Adequate Protection to Prepetition Secured Parties; (IV) Modifying the Automatic Stay; and (V) Granting Related Relief [Docket No. 65 – filed June 1, 2022];
- iii. Declaration of Robert A. Del Genio in Support of Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Senior Secured Priming Superpriority Postpetition Financing and (B) Use Cash Collateral, (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (III) Granting Adequate Protection to Prepetition Secured Parties; (IV) Modifying the Automatic Stay; and (V) Granting Related Relief [[Docket No. 66](#) – filed June 1, 2022];
- iv. Notice of Filing Proposed Redacted Version of the Declaration of Zul Jamal in Support of Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Senior Secured Priming Superpriority Postpetition Financing and (B) Use Cash Collateral, (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (III) Granting Adequate Protection to Prepetition Secured Parties; (IV) Modifying the Automatic Stay; and (V) Granting Related Relief [[Docket No. 68](#) – filed June 1, 2022];

- v. Interim Order (I) Authorizing the Debtors to (A) Obtain Senior Secured Priming Superpriority Postpetition Financing and (B) Use Cash Collateral, (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (III) Granting Adequate Protection to the Prepetition Secured Parties, (IV) Modifying the Automatic Stay, and (V) Granting Related Relief [[Docket No. 147](#) – entered June 3, 2022];
- vi. Declaration of Zul Jamal in Support of Debtors’ and Intervenor Defendant’s Consolidated Response to Plaintiffs’ Emergency Motion for Stay of Effectiveness and Enforcement of Order and Judgment Pending Appeal and Suspension of Other Proceedings [[Adv. Pro. Docket No. 84](#) – filed July 11, 2022];
- vii. Declaration of Robert Del Genio in Support of Debtors and Intervenor Defendant’s Consolidated Response to Plaintiffs’ Emergency Motion for Stay of Effectiveness and Enforcement of Order and Judgment Pending Appeal and Suspension of Other Proceedings [[Adv. Pro. Docket No. 85](#) – filed July 11, 2022];
- viii. Debtors’ and Intervenor Defendant’s Consolidated Response to Plaintiffs’ Emergency Motion for Stay of Effectiveness and Enforcement of Order and Judgment Pending Appeal and Suspension of Other Pleadings [[Adv. Pro. Docket No. 86](#) – filed July 11, 2022];
- ix. Notice of Filing of Proposed Redacted Version of the Official Committee of Unsecured Creditors’ Objection to Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Senior Secured Priming Superpriority Postpetition Financing and (B) Use Cash Collateral, (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (III) Granting Adequate Protection to the Prepetition Secured Parties, (IV) Modifying the Automatic Stay and (V) Granting Related Relief [[Docket No. 399](#) – filed July 10, 2022];
- x. Debtors’ Omnibus Reply to Objections to Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Senior Secured Priming Superpriority Postpetition Financing and (B) Use Cash Collateral, (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (III) Granting Adequate Protection to the Prepetition Secured Parties, (IV) Modifying the Automatic Stay, and (V) Granting Related Relief [[Docket No. 418](#) – filed July 12, 2022];
- xi. Motion for Leave to Exceed Page Limit for Debtors’ Omnibus Reply to Objections to Debtors’ Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Senior Secured Priming Superpriority Postpetition Financing and (B) Use Cash Collateral, (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (III) Granting Adequate Protection to

the Prepetition Secured Parties, (IV) Modifying the Automatic Stay, and (V) Granting Related Relief [[Docket No. 419](#) – filed July 12, 2022];

- xii. Omnibus Reply of the Ad Hoc Noteholder Group to Objections to Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Senior Secured Priming Superpriority Postpetition Financing and (B) Use Cash Collateral, (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (III) Granting Adequate Protection to the Prepetition Secured Parties, (IV) Modifying the Automatic Stay, and (V) Granting Related Relief [[Docket No. 423](#) – filed July 12, 2022];
- xiii. Ad Hoc Noteholder Group's Motion for Entry of an Order Granting Leave and Permission to File Reply in Support of DIP Motion [[Docket No. 425](#) – filed July 13, 2022];
- xiv. The Official Committee of Unsecured Creditors' Witness List for Hearing Scheduled for July 15, 2022 at 10:00 a.m. (Eastern Time) [[Docket No. 426](#) – filed July 13, 2022];
- xv. Mockingbird Credit Opportunities Company LLC's Witness and Exhibit List for Final DIP Financing Hearing on July 15, 2022 at 10:00 a.m. (Eastern Time) [[Docket No. 427](#) – filed July 13, 2022];
- xvi. Notice of Filing of Revised Proposed Final Order (I) Authorizing the Debtors to (A) Obtain Senior Secured Priming Superpriority Postpetition Financing and (B) Use Cash Collateral, (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (III) Granting Adequate Protection to the Prepetition Secured Parties, (IV) Modifying the Automatic Stay, and (V) Granting Related Relief [[Docket No. 429](#) – filed July 13, 2022];
- xvii. Debtors Witness List for July 15 Hearing [[Docket No. 430](#) – filed July 13, 2022].

Status: This matter is going forward solely as a status conference and the scheduling of a hearing on the final DIP order.

- 9. Debtors' Motion for Entry of an Order Authorizing the Filing Under Seal of the DIP Fees in the Debtor in Possession Financing Facilities [[Docket No. 166](#) – filed June 6, 2022].

Objection Deadline: June 20, 2022 at 4:00 p.m. (ET).

Objections/Responses Received:

- i. United States Trustee's Omnibus Objection to Debtors' Motions to Seal Filed at D.I. 164, 166, and 167 [[Docket No. 239](#) – filed June 17, 2022].

Related Documents:

- i. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Senior Secured Priming Superpriority Postpetition Financing and (B) Use Cash Collateral, (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (III) Granting Adequate Protection to Prepetition Secured Parties; (IV) Modifying the Automatic Stay; and (V) Granting Related Relief [[Docket No. 36](#) – filed June 1, 2022];
- ii. [SEALED] Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Senior Secured Priming Superpriority Postpetition Financing and (B) Use Cash Collateral, (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (III) Granting Adequate Protection to Prepetition Secured Parties; (IV) Modifying the Automatic Stay; and (V) Granting Related Relief [Docket No. 56 – filed June 1, 2022];
- iii. [SEALED] Declaration of Zul Jamal in Support of Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Senior Secured Priming Superpriority Postpetition Financing and (B) Use Cash Collateral, (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (III) Granting Adequate Protection to Prepetition Secured Parties; (IV) Modifying the Automatic Stay; and (V) Granting Related Relief [Docket No. 65 – filed June 1, 2022]; and
- iv. Notice of Filing Proposed Redacted Version of the Declaration of Zul Jamal in Support of Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Senior Secured Priming Superpriority Postpetition Financing and (B) Use Cash Collateral, (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (III) Granting Adequate Protection to Prepetition Secured Parties; (IV) Modifying the Automatic Stay; and (V) Granting Related Relief [[Docket No. 68](#) – filed June 1, 2022].

Status: **This matter is continued to the next hearing.**

10. Motion to File Under Seal Portions of the Declaration of Robert A. Del Genio [[Docket No. 167](#) – filed June 7, 2022].

Objection Deadline: June 21, 2022, at 4:00 p.m. (ET).

Objections/Responses Received:

- i. United States Trustee's Omnibus Objection to Debtors' Motions to Seal Filed at D.I. 164, 166, and 167 [[Docket No. 239](#) – filed June 17, 2022].

Related Documents:

- i. [SEALED] Declaration of Robert A. Del Genio [Docket No. 67 – filed June 1, 2022]; and
- ii. Notice of Filing Proposed Redacted Version of Declaration of Robert A. Del Genio [[Docket No. 70](#) – filed June 1, 2022].

Status: **This matter is continued to the next hearing.**

- 11. Motion to File Under Seal Portions of (I) TPC Group Inc.'s Brief in Opposition to Plaintiffs' Motion for Summary Judgment and (II) Declaration of Patrick Hurt [[Adv. Docket No. 53](#) – filed June 23, 2022]

Objection Deadline: **At or before the continued hearing.**

Objections/Responses Received:

- i. Informal comments from the U.S. Trustee.

Related Documents:

- i. [SEALED] TPC Group Inc.'s Brief in Opposition to Plaintiff's Motion for Summary Judgment [Adv. Docket No. 40 – filed June 17, 2022];
- ii. [SEALED] Declaration of Patrick Hurt [Adv. Docket No. 41 – filed June 17, 2022];
- iii. Notice of Filing of Proposed Redacted Versions of (I) TPC Group Inc.'s Brief in Opposition to Plaintiffs' Motion for Summary Judgment and (II) the Declaration of Patrick Hurt [[Adv. Docket No. 52](#) – filed June 23, 2022]; and
- iv. Notice of Filing of Revised Proposed Redacted Version of TPC Group Inc.'s Brief in Opposition to Plaintiffs' Motion for Summary Judgment [[Adv. Docket No. 59](#) – filed June 28, 2022].

Status: **This matter is continued to the next hearing.**

- 12. Motion to Seal Certain Information in the (A) Emergency Motion of Plaintiffs for Stay of Effectiveness and Enforcement of Order Pending Appeal and Suspension of Other Proceedings Pursuant to Bankruptcy Rule 8007, (B) Supplemental Objection of Cerberus Capital Management, L.P. and Bayside Capital, Inc. to Debtors' Motion for Entry of Interim and Final Order (I) Authorizing the Debtors to (A) Obtain Senior Secured Priming Superpriority Postpetition Financing and (B) Use Cash Collateral, (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (III) Granting Adequate Protection to the Prepetition Secured Parties, (IV) Modifying the Automatic Stay, and (V) Granting Related Relief and (C) Declarations of Alexander Tracy Filed in Support of the Foregoing [[Docket No. 395](#) – filed July 8, 2022].

Objection Deadline: **At or before the continued hearing.**

Objections/Responses Received: None at this time.

Related Documents:

- i. [SEALED] Supplemental Objection of Cerberus Capital Management, L.P. and Bayside Capital, Inc. to Debtors Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Senior Secured Priming Superpriority Postpetition Financing and (B) Use Cash Collateral, (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (III) Granting Adequate Protection to the Prepetition Secured Parties, (IV) Modifying the Automatic Stay, and (V) Granting Related Relief [Docket No. 393 – filed July 8, 2022].

Status: **This matter is continued to the next hearing.**

13. Motion to File Under Seal the Objection of Official Committee of Unsecured Creditors to Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Senior Secured Priming Superpriority Postpetition Financing and (B) Use Cash Collateral, (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (III) Granting Adequate Protection to the Prepetition Secured Parties, (IV) Modifying the Automatic Stay and (V) Granting Related Relief [[Docket No. 400](#) – filed July 10, 2022].

Objection Deadline: **At or before the continued hearing.**

Objections/Responses Received: None at this time.

Related Documents:

- i. [SEALED] Objection of Official Committee of Unsecured Creditors to Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Senior Secured Priming Superpriority Postpetition Financing and (B) Use Cash Collateral, (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (III) Granting Adequate Protection to the Prepetition Secured Parties, (IV) Modifying the Automatic Stay and (V) Granting Related Relief [Docket No. 390 – filed July 8, 2022];
- ii. Notice of Filing of Proposed Redacted Version of Official Committee of Unsecured Creditors' Objection to Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Senior Secured Priming Superpriority Postpetition Financing and (B) Use Cash Collateral, (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (III) Granting Adequate Protection to the Prepetition Secured Parties, (IV) Modifying the Automatic Stay and (V) Granting Related Relief [Docket No. 399 – filed July 8, 2022].

Status: **This matter is continued to the next hearing.**

Dated: July 14, 2022
Wilmington, Delaware

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